



BURLINGTON PLANT POLICY AND PROCEDURE



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TITLE: SPILL PREVENTION CONTROL COUNTERMEASURE (SPCC) PLAN

PURPOSE: To establish procedures, methods and equipment to prevent the discharge of oil into navigable waters. This procedure complies with the terms and conditions of 40 CFR Part 112, Oil Pollution Prevention. The Burlington facility stores oil above ground in quantities greater than 1,320 gallons, therefore a SPCC Plan is required.

SCOPE: This procedure applies to the Burlington Plant physical property.

REVISION INFORMATION:

Rev Let.	Rev. By Initial	Rev. Date	Section No(s)	Description of Change
A	LK	4/2/96	10, 31	Update list and add III.J.5
B	LK	4/30/97	II.G,H,III.A, IV, Exh I, Exh III	Update contact lists, NPDES sampling reqs and reword procedure text for better clarification.
C	LK	4/30/98	Exh. I	Update Corporate contact list
D	NB	4/30/01	All	Annual review to update name's, no change in plan
E	TW	8/12/02	Various	Updated contact list and to reflect current practices
F	TW	6/16/04	All	Update according to SPCC final rule dated July 17, 2002
G	TW	04/15/07	Various	Clarify release reporting requirements and consolidating redundant information
H	NB	9/15/09	Certification,III.A.1, Area 6, Exh I	Update contact Information

APPROVED:

original is signed

Functional Mgr. Title

7-17-09
Date

Plant Manager

9-23-09
Date

DOCUMENT DISTRIBUTION NUMBER:

DOCUMENT CONTROL: Controlled copy only if stamped in red by Document Control.



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I. Process Flow Chart

Responsibility

Paragraph

Chart

N/A



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CERTIFICATION

Spill Prevention Control and Countermeasure Plan

General Information

Name of facility: CNH Burlington Plant

Type of facility: Manufacturer of Construction Equipment

Location of facility: 1930 Des Moines Ave., Burlington, Iowa 52601

Name and address of owner or operator:

Name: CNH America, LLC

Address: 700 State Street, Racine, Wisconsin 53404

Attn: Don Black, Phone (319) 754-3403

Designated person accountable for oil spill prevention at Facility:

Name and title: Don Black - Environmental Manager

MANAGEMENT APPROVAL

[40 CFR §112.7]

This SPCC Plan is fully approved by management, and the necessary resources have been committed to implement the Plan as described.

original is not signed

Signature: _____ Date: _____

Name: _____

Title: Director, Burlington Operations



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II. Facility Description

[40 CFR §112.7(a)]

A. Facility Name and Address:

CNH America, LLC
Burlington Plant
1930 Des Moines Avenue
Burlington, Iowa 52601

B. Manufacturing Process:

Construction Equipment Manufacturing, SIC Code 3531

C. Name and Address of Owner:

CNH America, LLC
700 State Street
Racine, WI 53404

D. Facility Description:

CNH America, LLC, Burlington Plant is a manufacturer of construction equipment. Production activities include Welding, machining, metal fabrication, painting and assembly. The Burlington Plant produces loader/backhoes, crawlers, and forklift trucks. Research and development along with product testing is also performed at the plant.

E. Operating Hours:

Normal operation is two shifts per day working five days per week. First shift normally operates from 7:00 AM to 3:30 PM. Second shift normally operates from 3:30 PM to 11:00 PM. In general, production activities occur during first and second shifts.



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F. Plant Security:

[40 CFR §112.7(g)]

The plant is secured by perimeter fencing and a 24-hour/365 day security guard force. All employees are required to pass through one of four security gates and all visitors are required to check in with a guard. The plant is patrolled by security and all areas of the plant are lighted.

G. Wastewater/Sanitary Discharges:

All process wastewater is treated through the plant's wastewater treatment system. Approximately 20,000 gallons of water is treated on a daily basis. All treated water is discharged to the sanitary sewer system per City of Burlington issued Wastewater Discharge Permit and City Sanitary Sewer Ordinance. All non-process wastewater is discharged directly to the sanitary sewer. The plant monitors its discharge via two monitoring stations with monthly sample collection and chemical analysis.

H. Storm Water Discharge:

Plant storm water, boiler blow-down and non-contact cooling water is discharged to the storm sewer system which empties into the O'Connel Slough, which flows to the Mississippi River. The river system is located east of the plant. All storm water discharges are permitted through the State of Iowa, National Pollution Discharge Elimination System Permit (NPDES). The plant monitors its storm water discharges at two outfalls in accordance with its NPDES permits.

There is a storm water retention pond and a flood gate system associated with the storm sewer system. "Oil only" absorbent booms are available in the maintenance shed for use in the containment of a release to the storm water retention pond. The flood gates are manually adjusted by the CNH security guard force. In the event of an uncontrolled release to the storm sewer system, the floodgates can be closed to contain a release.

I. Aboveground Storage Tanks (ASTs):

[40 CFR §112.8(c)]

All storage tanks at the plant are located above ground. The ASTs are under roof and stationed in bermed containment areas. Each containment has a capacity to hold 110% of the volume of the largest AST located in the bermed area. Containment areas Except for the 300 gallon gasoline tank) are equipped with sump holes. There is a float switch



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located in each sump hole that will trip an audible alarm when liquid is present in the bermed area. The alarm will sound in the plant to alert personnel.

Materials stored in the ASTs include; diesel fuel, motor oil, anti-freeze, transmission oil, hydraulic oil, Gasoline and used oil. Fill ports for each tank, except for the gasoline tank, are located on the outside wall of the containment rooms and are protected by drip pans. In addition, fill ports are pad-locked when not in use.

J. Used Oil Collection:

Used oil generated at individual machines and areas in the plant is collected in 50-gallon polyethylene tanks designated for "Used Oil Only". Each polyethylene tank is placed on a secondary containment pallet.

III. Procedure

A. Environmental Manager:

1. Don Black
Plant Environmental Manager

Home Address: 1802 Koestner
Burlington, IA 52601
Phone Numbers: Plant 319-754-3403
Home 309-678-2440
Cell 319-209-0908

2. First Alternate:
Eric Orth
Paint Finish Engineer

Home Address 1214 angular Street
Burlington Iowa 52601
Phone Numbers: Plant 319-754-3243
Home
Cell 319-572-5253



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3. Second Alternate:
Chris Smith
Facilities Manager

Phone Numbers: Plant 319-754-3495
Home 319-868-5737
Cell 319-209-1240

B. Environmental Responsibilities

1. Document and report all reportable spill incidents to the appropriate government agencies. Evaluate hazards associated with the release using the Hazardous Substance Exposure Survey (Exhibit I of Employee Emergency and Fire Prevention Plan P9.2.13). Determine source of release and activities to minimize and/or eliminate any future occurrences. Update SPCC plan to include incident and any improvements made.
2. Provide training to plant personnel who will be called upon to respond, to spills and releases.
3. Ensure that spill response equipment and materials are available for responders. Spill kit drums are located in various areas of the plant. Please reference Exhibit IV for the spill kit locations.
4. Arrange for recovery, transportation, treatment and/or disposal of spilled material.
5. Ensure that sufficient aisle space and access to all areas of the plant is maintained.
6. Provide local emergency response teams with updated copies of the SPCC plan and ensure that these teams are familiar with the plant and associated spill risk areas.

C. Spill Responder Responsibilities

Plant personnel asked to respond to petroleum releases will contain the release, identify hazards associated with the release and perform minor clean-up activities.



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Area 3 - Diesel Fill Station, Bldg. 40 North

The diesel fill station is used to fill plant trucks/tractors used by the maintenance department. The diesel is supplied from the diesel tanks located in Area 2. A spill kit is located next to the dispenser and contains a drain stopper.

Two storm drains are located in the area. The drains are at risk of being contaminated if a release were to occur at this station. The first storm drain is located approximately 40 feet directly north of the dispenser. The second is located another 45 feet north of the first storm drain.

Prior to filling a vehicle, the person who is to dispense diesel fuel, is required to remove the drain stopper from the spill kit and place it over the first storm drain as a precautionary measure. This will reduce the risk to the storm drain in the event that a release should occur during filling operations. In addition, the supply line for the dispenser is located immediately inside the doorway adjacent to the dispenser. The valve on the supply line can be turned off in the event of a release from a broken line or dispenser.

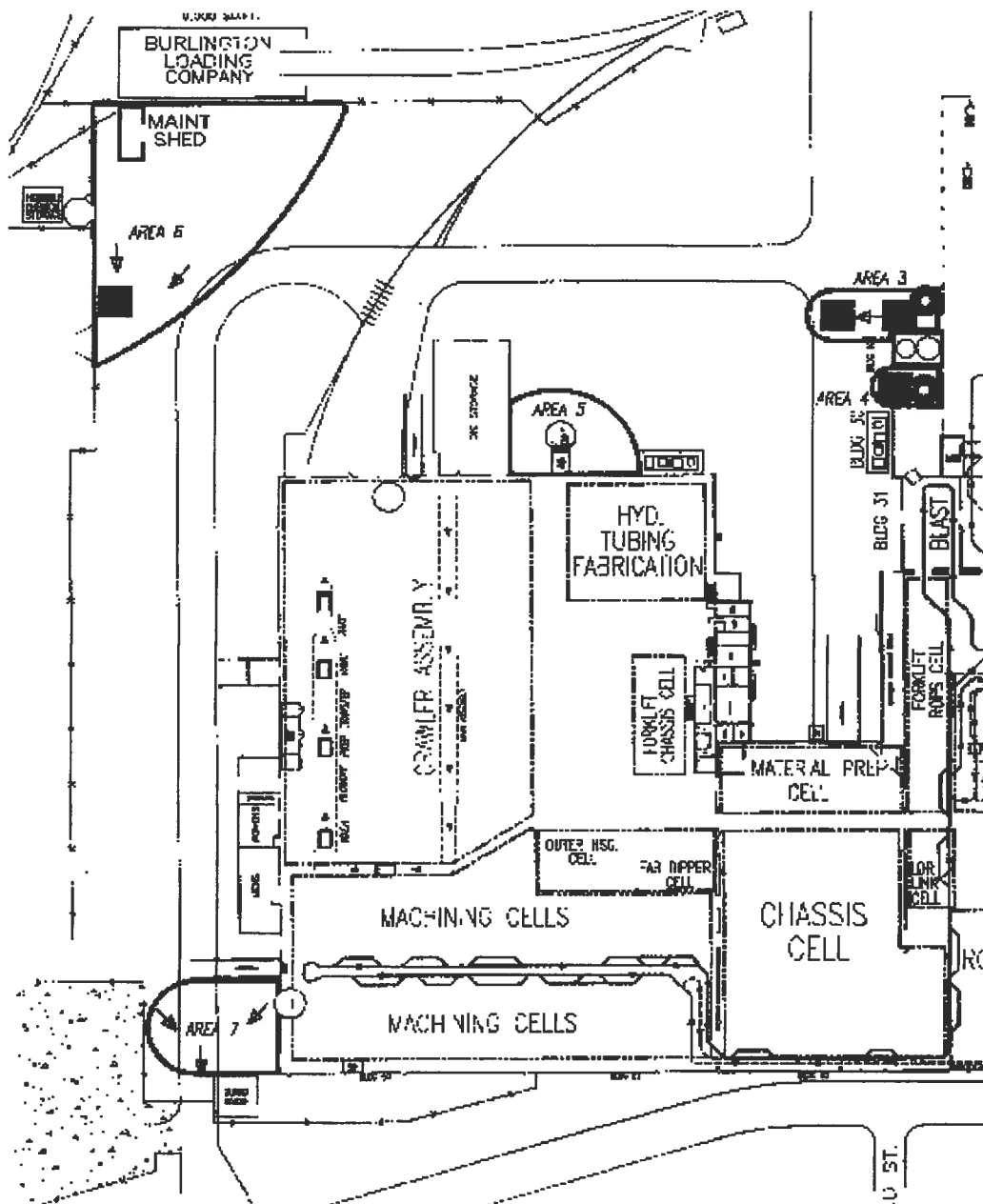
Securing the dispenser in an open position by tying, banding, etc. is prohibited. Plant personnel are required to stay with the vehicle during filling operations



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Area 4 - E-Coat Resin Tank Fill Area, Bldg 10 North (Exempt from SPCC regulations as per 40 CFR Part 112.1(b))

This fill station is used by suppliers when delivering resin for production processes. Concern in this area arises when filling of the E-coat resin tank takes place. The resin tank is located along the inside of the north wall of Building 10 North. In order to get close to the tank, a tanker truck will be pulled up to the building and parked over and/or near storm drains. During unloading operations and while the tanker is parked outside, storm drains are at risk of contamination if the supply hose or fittings rupture and release resin to the environment.

A spill kit (drain stopper included) is located along the containment area of the wastewater holding tanks located just outside of Building 10 North. The tanker will be pulled along the side of this containment area.

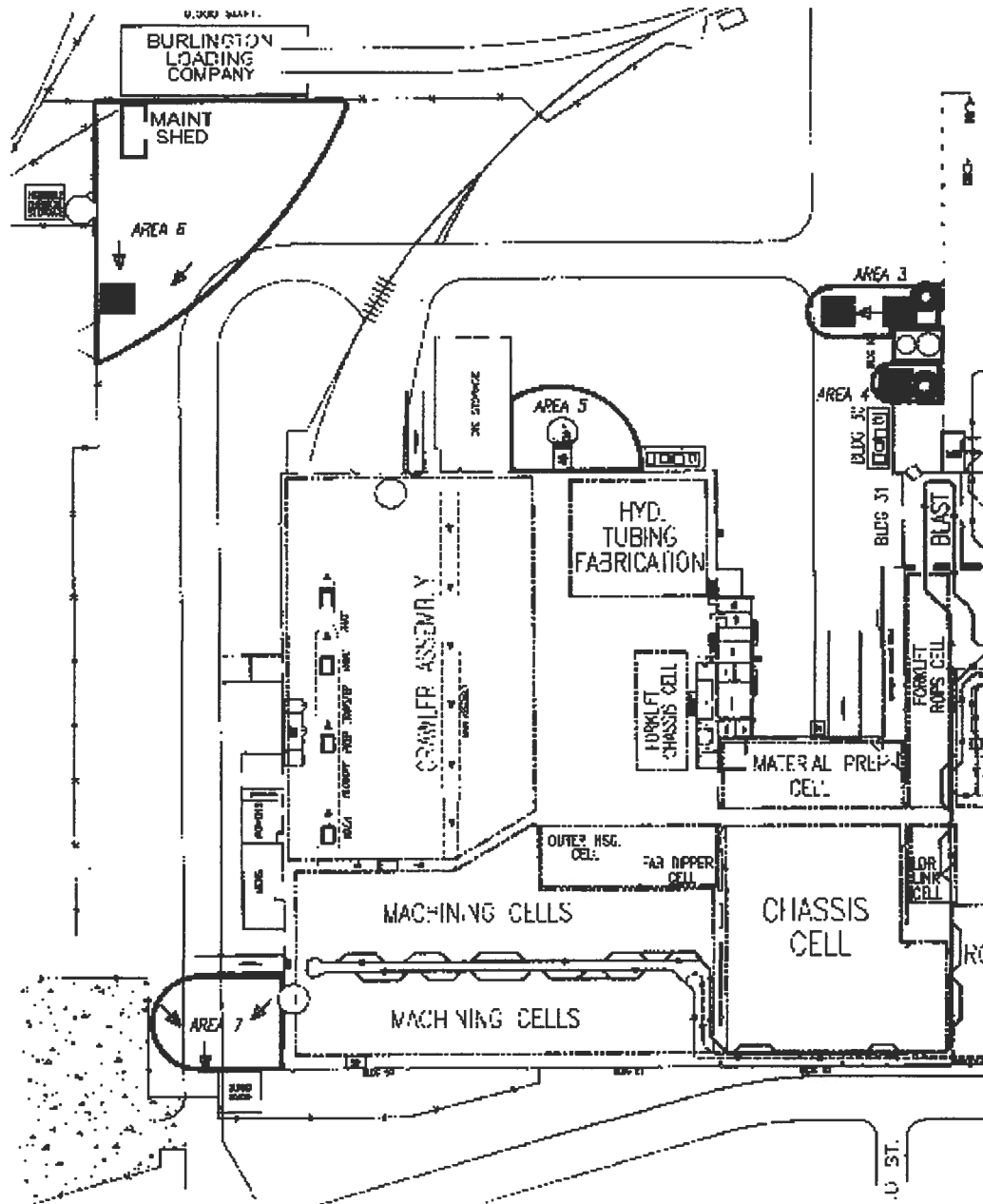
Upon arrival, the tanker truck operator and/or E-Coat technicians are required to remove the drain stopper from the spill kit and place over the storm drain located immediately northwest of the containment area. The truck operator is required to stay with the vehicle at all times.



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Area 5 - Aboveground Storage Tank Room, Bldg 51 (The ASTs in Building 51 are currently empty and out-of-service.)

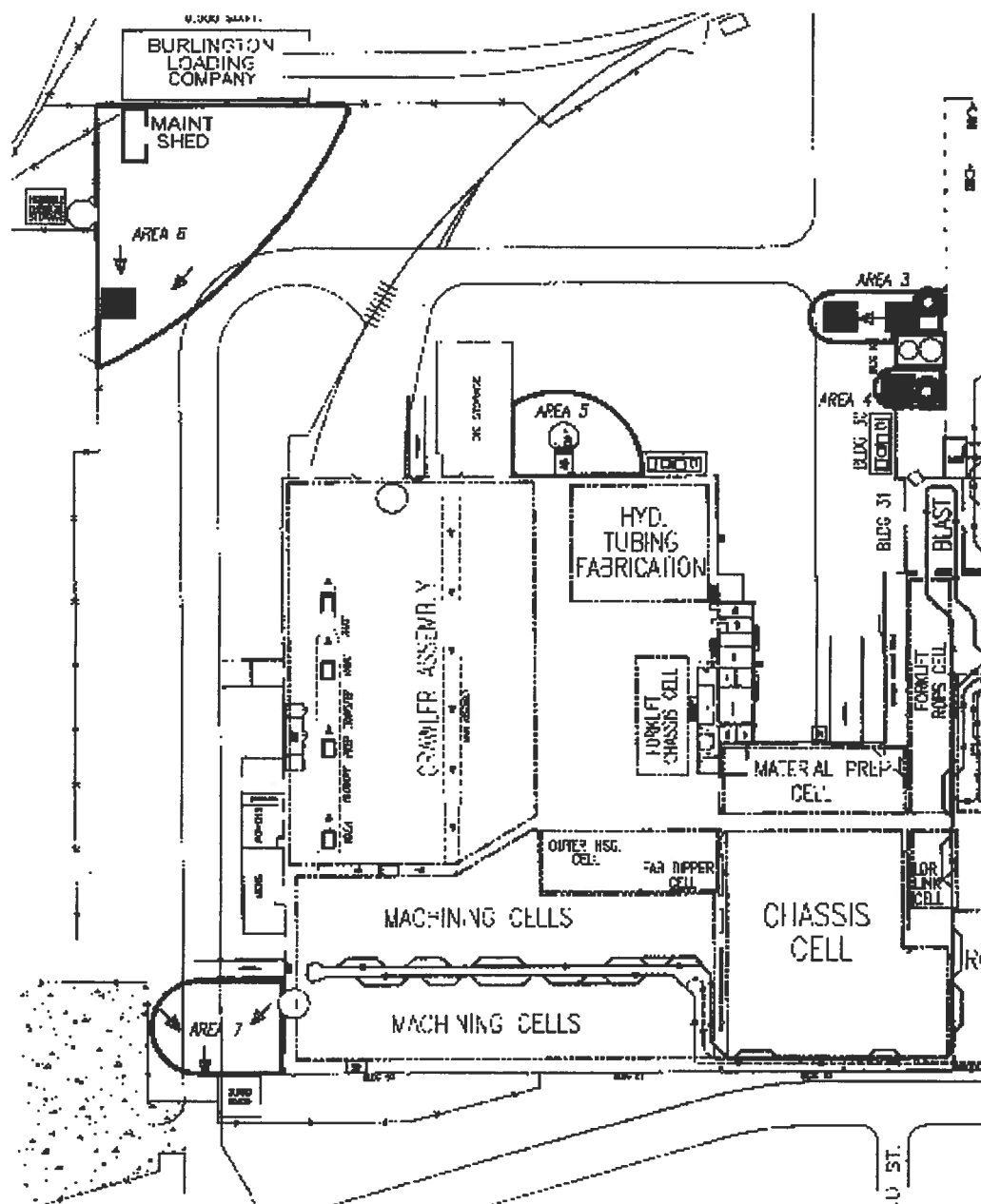
Two 6,000-gallon ASTs are located in this storage area. One AST contained TCH hydraulic fluid and the other contained diesel fuel. Two 2,000-gallon ASTs that contained engine oil and anti-freeze are also located in Building 51. The storage area is divided into two rooms. Each room is accessible from the other.

There are no storm drains in the immediate area. A spill kit is located under the outside stairwell leading up to the storage room.

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Area 6 - Drum Storage Area, Northeast Corner of the Plant

This storage area is used to store containers of non-hazardous wastes and used oil. The storage area is covered by a roof (pole barn), is diked and secured by a chain-link fence which is kept locked at all times. Only authorized personnel have access to the storage area which includes some maintenance personnel and the Plant Environmental Manager.

A spill kit is located immediately outside of the security fence gate.

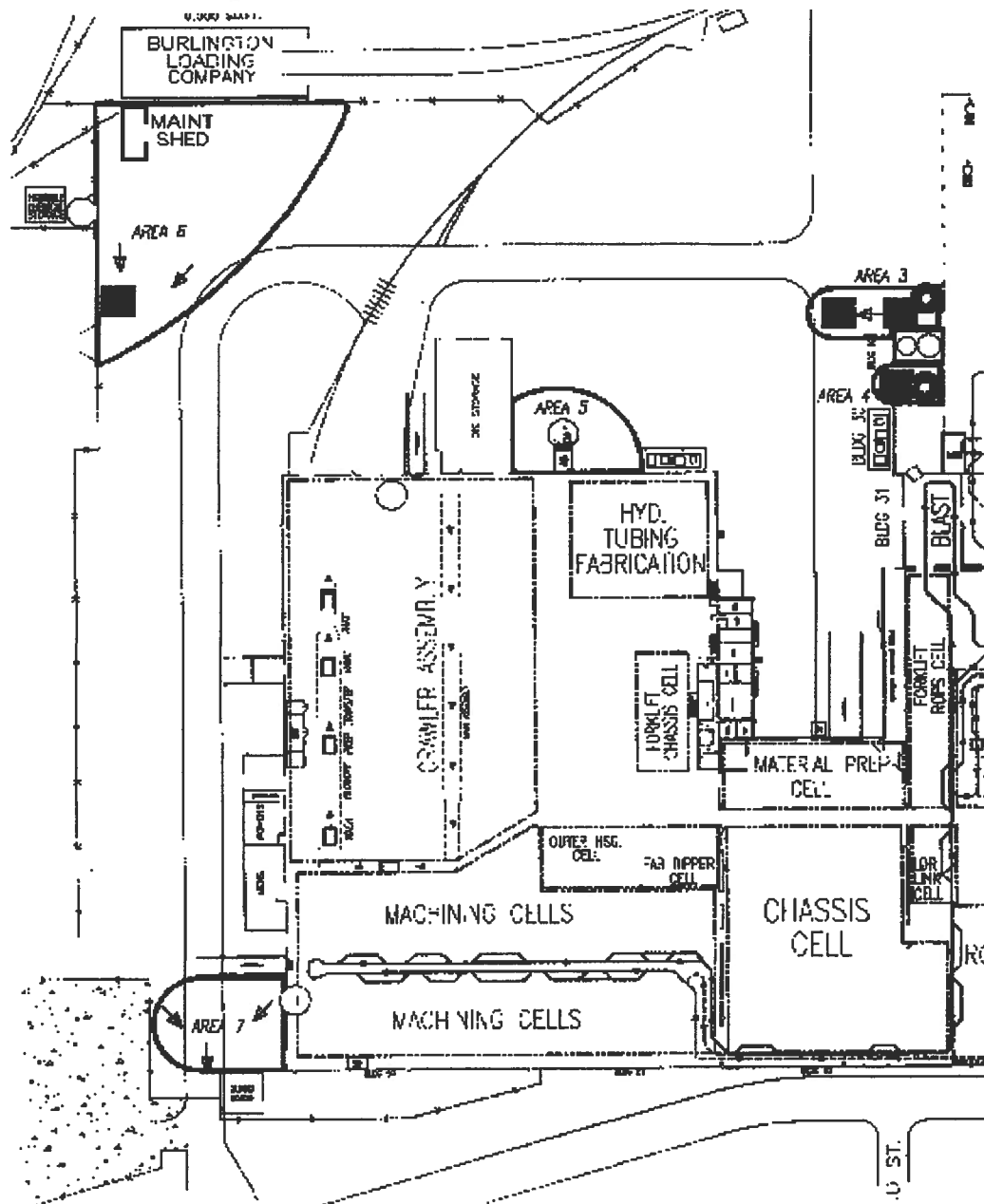
Releases or spills from containers located in the diked area will be contained.



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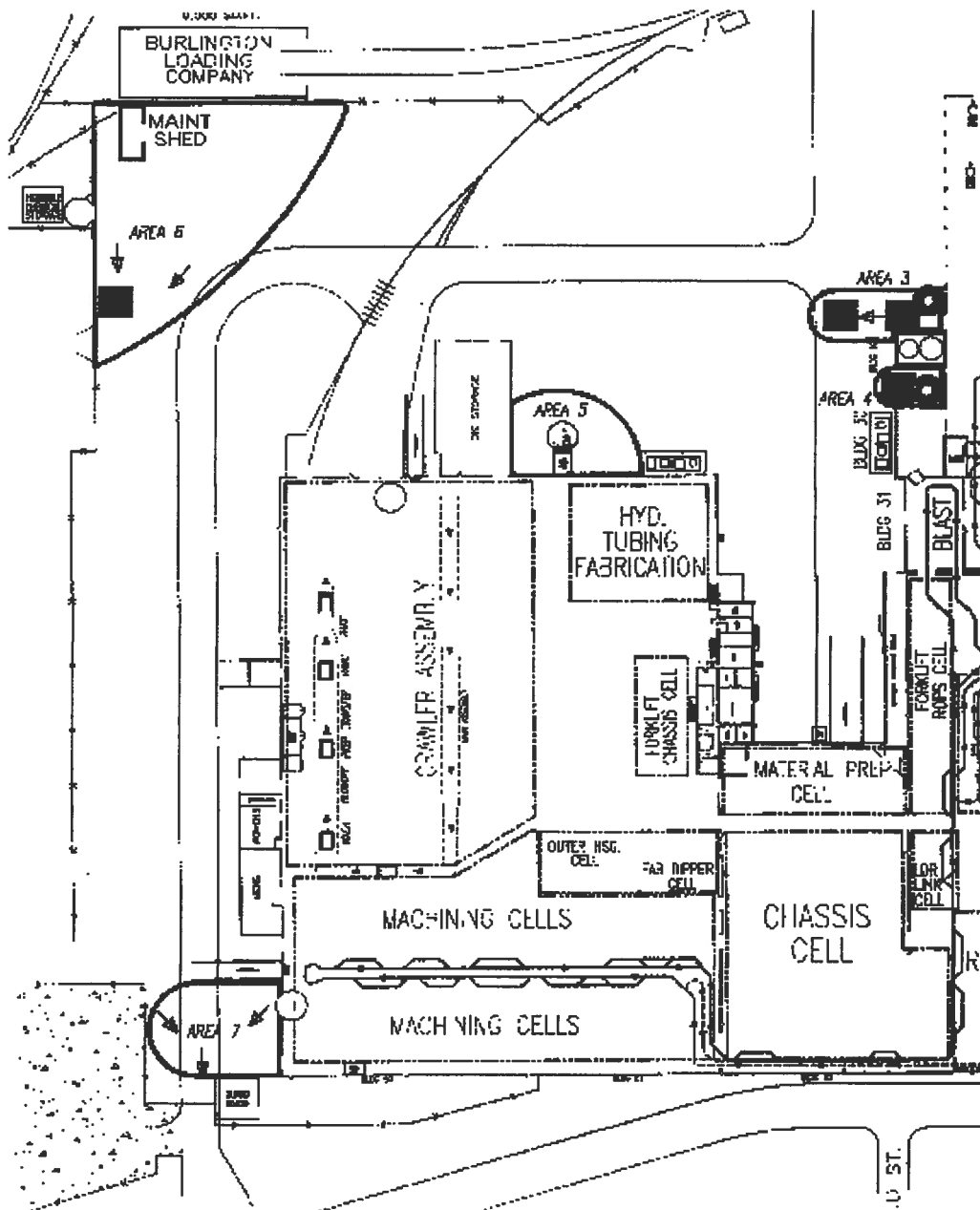


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Areas 7, 8,11,12,13 - Shipping and Receiving Docks

The docks are sloped toward the buildings. Drains are located in each bay that discharge to the storm sewer system. Spill risks in these areas include ruptured saddle tanks on trucks and potential spills and releases of materials during loading and unloading. In the event of a release, drains need to be secured as quickly as possible using absorbent booms and pads. Spills should be contained in the loading ramp provided that the drains are sealed and protected.

Any liquid that could pose a risk to the drain system, either hazardous or non-hazardous are to be received through door 5 only. This is the farthest door from the drain.

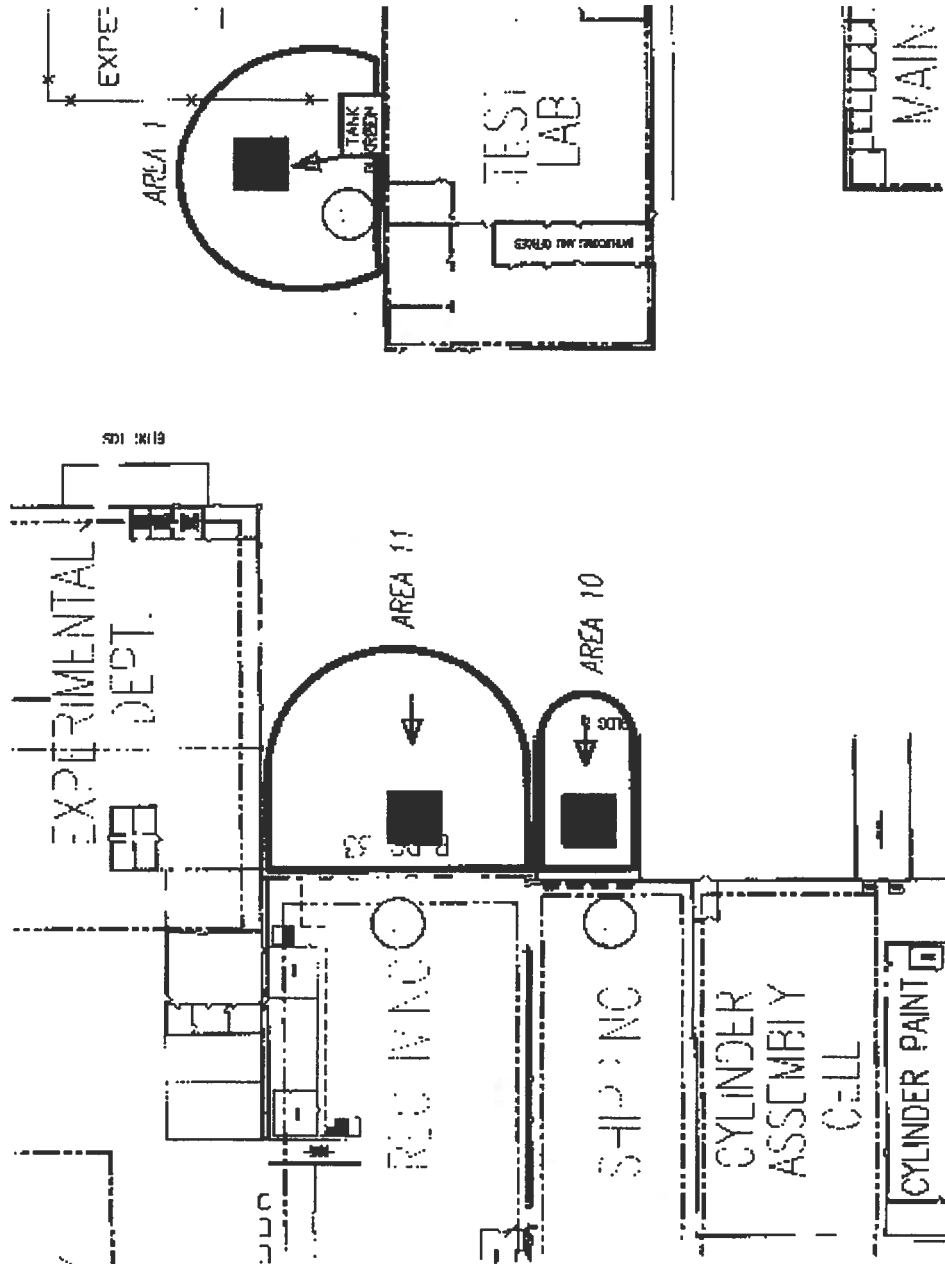




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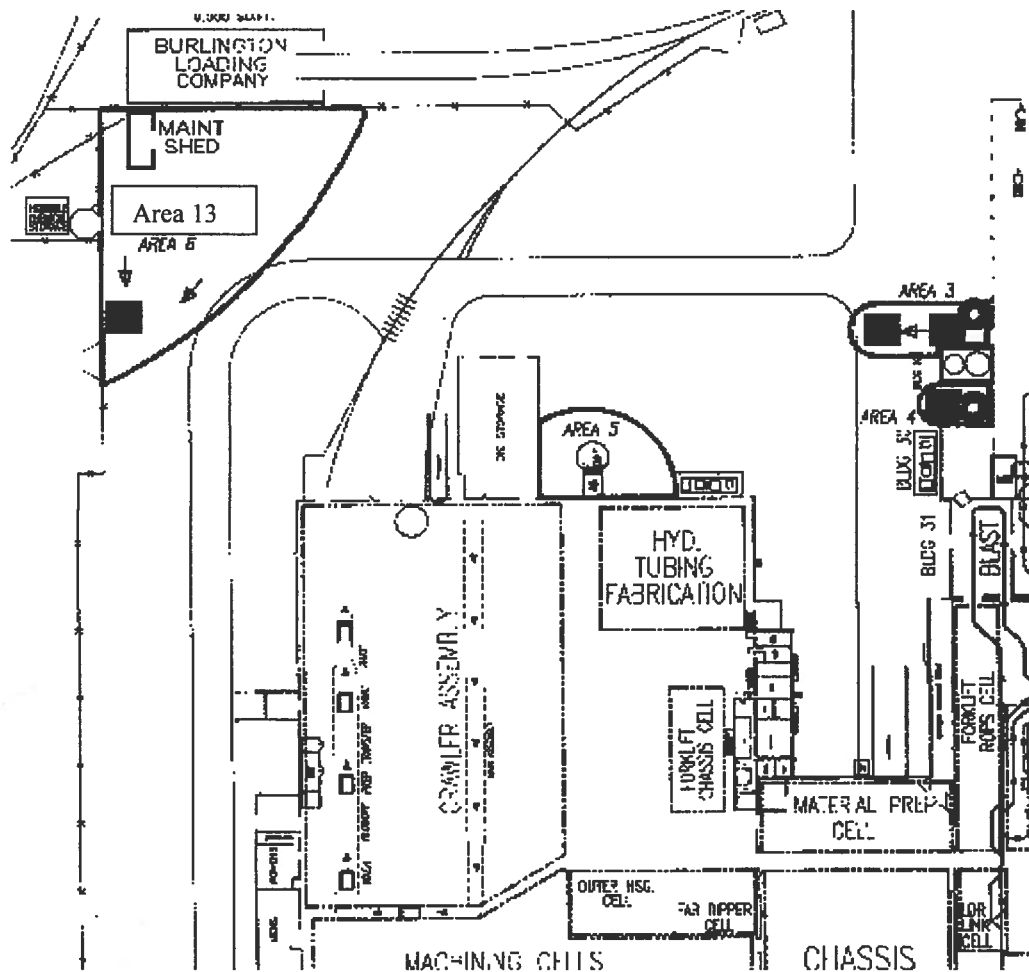


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Area 13- 300 gallon gasoline storage tank

The 300 gallon storage tank is located in the red shed at the North end of the plant. The gasoline is used for Maintenance welders and other gasoline driven pumps ECT. The tank is filled once a year with 50 gallons of gasoline. The nearest Storm Drain is located about 75 feet to the west. The grade from the filling pad would be slightly to the north then to the west. During the filling process a spill kit, located adjacent to the shed will be opened and ready in case of a spill.

As this risk only occurs once a year and at such a small quantity special provisions can be administered, like being prepared with the spill kit.





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PROFESSIONAL ENGINEER CERTIFICATION

[40 CFR §112.3(d)]

I hereby certify that I have examined the CNH America, LLC, Burlington, Iowa plant, and being familiar with the provisions of Title 40 CFR Part 112, attest that this Spill Prevention Control and Countermeasure Plan has been prepared in accordance with good engineering and environmental management practices, including consideration of applicable industry standards, and in accordance with EPA requirements of the SPCC final rule dated July 17, 2002.

Henry E. Adamiak, P.E.

Printed Name of Registered Professional Engineer

Signature of Registered Professional Engineer

original is not signed

Illinois #062-051928

State of Registration and Number

November 30, 2005

Expiration Date



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Exhibit V

SPCC Employee Awareness Guide

If you discover a release of petroleum products, the following steps should be taken immediately:

- 1) Notify security at 3511. Report to the security guard your name, location of the release and the material that has been released.
- 2) If the situation allows not putting your health and safety at risk (i.e. no fire present, easy access available, etc.), take initial steps to minimize the extent of the release by removing its source (i.e. shut off supply valve, etc.).
- 3) Secure the area to keep non-responding personnel from entering the release area.
- 4) Stay at the scene until responders arrive to direct them to the release and provide information on developments that may have occurred since the initial notification to the security guard.
- 5) If at any time you feel that your health and safety are at risk, leave the area.



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Exhibit VI

Burlington Plant Above Ground Tank Load/Unload Checklist

This form must be filled out and every item addressed every time a tank truck unloads at Burlington

Name of trucking firm:

Truck Drivers Name:

Contents of Truck:

Date & Time:

Before Unloading

	Initials	NA
1. Verify available capacity of storage tank to which product will be unloaded		
2. Ensure that all appropriate personal protective equipment is being worn by all individuals involved(((Safety shoes and safety glasses are required at all times)		
3. Ensure that all vehicles are shut off.(NA if engine needs to run for pump)		
4. Ensure that the handbrake is set		
5. Ensure that unloading is attended at all times		
6. Place spill mat cover over closest drain		
7. Guard, turn off toggle switch-Located in Tire Dock	Guard	Time

Smoking is prohibited in this vicinity

After Unloading

	Initials	NA
1. Ensure that the discharge valve caps are on and secured		
2. Ensure that the drip pans lids are closed (NA if not applicable)		
3. Verify that the cargo tank is checked for leakage		
4. Replace spill mat cover back into proper container		
5. Drop off form at guard shack		
6. Guard, Turn on toggle switch – located in Tire Dock	Guard	Time

All items must be addressed and initialed by the person responsible.
If an item does not apply the column must be marked accordingly.

Signature: _____

Date: _____